

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION**

**MED CARE EMERGENCY** §  
**MEDICAL SERVICES, INC.,** §  
**Plaintiff** §

**VS**

**C.A. NO. 7:21-cv-00445**

<b>CITY OF PHARR, TEXAS,</b>	<b>§</b>
<b>ITZA FLORES, AMBROSIO “AMOS”</b>	<b>§</b>
<b>HERNANDEZ, RICARDO MEDINA,</b>	<b>§</b>
<b>DANIEL CHAVEZ, RAMIRO</b>	<b>§</b>
<b>CABALLERO, ROBERTO “BOBBY”</b>	<b>§</b>
<b>CARRILLO</b>	<b>§</b>
<b>Defendants</b>	<b>§</b>

## **PLAINTIFF'S MOTION FOR ELECTRONIC HEARING**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff Med Care Emergency Medical Services, Inc. (Med Care EMS), and files this Motion Requesting that the court's setting for a Status Conference Hearing on December 07, 2022 at 2:30pm CST, to be held at the Bentsen Tower, 1701 W. Hwy. 83, McAllen, Texas 78501 *Dkt 43*, be changed to an electronic hearing (via Zoom).

### Grounds for Relief

Plaintiff makes this motion to Address issues affecting Plaintiff's Counsel on matters of travel-time between McAllen and San Antonio Texas; rising costs of travel and, increase in Covid-19 infection. Plaintiff's counsel has been recently suffering from a Respiratory Virus Infection.

The Scheduled December 07, 2022 Status Conference Hearing *Dkt 43*, is not an evidentiary hearing that requires Counsel physical presence but a Status Conference. As a status conference, it is a report by council to the court on status, answering questions provided by the court and counsel.

WHEREFORE PREMISES CONSIDERED, Plaintiff's Counsel requests this Court allow counsel to appear via electronic means via Zoom at the time and date of this court's order for a Motion Hearing issued December 7th, 2022 *Dkt 43*.

SIGNED THIS 02 day of December 2022.

Respectfully Submitted,

By: /s/ Francisco R. Canseco  
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**COUNSEL FOR PLAINTIFF MED CARE  
EMERGENCY MEDICAL SERVICES, INC.**

### **CERTIFICATE OF CONFERENCE**

The undersigned Counsel for the Plaintiff hereby CERTIFIES that as of the 02 day of December 2022 he has conferred with Counsel for the Defendants and ascertained that Defendant is unopposed to the disposition of the foregoing Motion.

/s/ Francisco R. Canseco  
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### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of this document has been served in accordance with one or more of the recognized methods of service by the Federal Rules of Civil Procedure on the persons or parties identified below on this, the 02 day of DECEMBER, 2022.

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